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Deceased died in 1910; these parties are now for a sixth time in court. Yet the case calls merely for the application of a universally acknowledged rule. It perfectly exemplifies the need of reorganizing the judiciary with a view to decreasing and disposing of litigation. See A. W. Scott, "Progress of the Law: Civil Procedure," 33 HARV. L. REV. 238. Based on an examination of twenty thousand California cases, a despairing writer intimates it might be socially more desirable if the Federal Court decided each personal injury case as soon as filed by rolling dice, rather than by taking fifteen months to reach an absolutely just decision. See S. B. Warner, "Procedural Delay in California," 8 CAL. L. REV. 369. The principal case outherods Herod.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — RIGHTS OF INNOCENT OWNER UNDER STATUTORY FORFEITURE. — A Virginia statute provides that an automobile caught carrying intoxicating liquor shall be forfeited to the state. (1918 ACTS, 612.) A chauffeur in the District of Columbia was instructed to take his master's car to a garage. Instead of doing so, he drove into Virginia, becoming at once a thief by the law of the District of Columbia. He was arrested in Virginia carrying prohibited liquor in the car. It was admitted that the owner was ignorant of the unlawful use, and was in the exercise of due care. *Held*, that the automobile was forfeited, notwithstanding the innocence of the owner. *Buchholz v. Commonwealth*, 102 S. E. 760 (Va.).

For a discussion of the principles involved in this case, see NOTES, p. 200, *supra*.

CONSTITUTIONAL LAW — DUE PROCESS OF LAW — WHAT SATISFIES THE PUBLIC PURPOSE REQUIRED IN TAXATION. — The Supreme Court of North Dakota had sustained, as constitutional, taxes for the purpose of a state bank, loans on real estate, state flour mills, and state-built homes. *Held*, that the judgment should be affirmed. *Green v. Frazier*, U. S. Sup. Ct., October Term, 1919, No. 811.

For a discussion of this case, see NOTES, p. 207, *supra*.

CONSTITUTIONAL LAW — *EX POST FACTO* AND RETROACTIVE LAWS — LAW VALIDATING UNAUTHORIZED COLLECTION OF CANAL TOLLS. — The defendant board maintained certain canals, which were used by the plaintiff's boats. The legislature had failed to grant to the board the power to charge tolls. The board nevertheless required the plaintiff to pay tolls for using the canals. The plaintiff paid under protest, and later brought suit to recover the money so paid. Thereafter the legislature passed a statute which retroactively authorized the collection of the tolls. *Held*, that the statute is constitutional. *Board of Commissioners of Everglades Drainage District v. Forbes Pioneer Boat Line*, 86 So. 199 (Fla.).

The federal constitution does not prohibit retrospective legislation as such. *League v. Texas*, 184 U. S. 156. The provision forbidding *ex post facto* laws applies only to criminal statutes. *Calder v. Bull*, 3 Dall. (U. S.) 386. However, a retrospective state law impairing the obligations of contracts is invalid. *Sturges v. Crowninshield*, 4 Wheat. (U. S.) 122. But this applies only to true contracts, based on the assent of the parties. *Freeland v. Williams*, 131 U. S. 405. The principal case involves only a quasi-contractual right, and hence no question of impairing the obligations of contracts can arise. See *State v. New Orleans*, 38 La. Ann. 119. A further limitation upon the power of the states to pass retrospective laws is found in the provisions of the Fourteenth Amendment. See *White v. Crump*, 19 W. Va. 583, 592. These provisions protect vested property rights. *Grigsby v. Peak*, 57 Tex. 142. A legal right of action is property, and is protected. *Osborn v. Nicholson*, 13 Wall. (U. S.) 654. See *Pritchard v. Norton*, 106 U. S. 124, 132. But even if a claim be regarded as a